

**FILED**

**MAR 25 2015**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

DAVID GREWS, CLERK  
BY *[Signature]*  
Deputy

UNITED STATES OF AMERICA

v.

GRAEME PHILLIP HARRIS

CRIMINAL NO. 3:15CR 022  
18 U.S.C. § 241  
18 U.S.C. §§ 245(b)(2)(A) & (C)  
18 U.S.C. § 2

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

From on or about the evening of February 15, 2014 until on or about the morning of February 16, 2014, in the Northern District of Mississippi, the defendant, GRAEME PHILLIP HARRIS, did knowingly and willfully combine, conspire and agree with at least one other person known to the Grand Jury to injure, oppress, threaten and intimidate African-American students and staff attending, enrolled in and employed by the University of Mississippi, a publicly-funded institution of higher learning, in the free exercise and enjoyment of rights secured to them by the Constitution and laws of the United States, that is, the right to pursue and enjoy a public education free from racial violence and intimidation from the threat of racial violence. It was part of the plan and purpose of the conspiracy that the defendant, GRAEME PHILLIP HARRIS, and his co-conspirators went under cover of darkness to the James Meredith statue, a civil rights monument and likeness of the first African-American student to enroll at the University of Mississippi, where they symbolically tied a rope around the neck of the statute and draped it in an outdated version of the Georgia state flag, which prominently depicts the Confederate battle flag, in order to intimidate and interfere with and in an attempt to intimidate and interfere with the

victims' exercise of constitutional rights and the enjoyment of a public education; all in violation of Title 18, United States Code, Section 241.

**COUNT TWO**

On or about February 15, 2014 through on or about February 16, 2014, in the Northern District of Mississippi, the defendant, GRAEME PHILLIP HARRIS, aided and abetted by others known to the Grand Jury, by threat of force, did knowingly and willfully intimidate and interfere with and attempt to intimidate and interfere with African-American students and staff at the University of Mississippi, a publicly-funded school, because of their race and color and because they were attending, enrolled in and employed by the University of Mississippi, in that the said GRAEME PHILLIP HARRIS and his accomplices hung a rope and Georgia state flag containing the Confederate battle flag around the neck of the statue of James Meredith, an iconic symbol of the civil rights movement at the University of Mississippi; all in violation of Title 18, United States Code, Sections 2 and 245(b)(2)(A) and (C).

A TRUE BILL

  
UNITED STATES ATTORNEY

/s/ Signature Redacted  
FOREPERSON